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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARC GALLI,

Plaintiff,

vs.

ANTHONY RUSH, individually and in  
his official capacity; EDWARD PICKUP,  
individually and in his official capacity;  
HENDERSON FIRE DEPARTMENT, a  
municipal entity; MARISSA MEYERS,  
individually and in her official capacity;  
and JOSHUA FILSINGER, individually  
and in his official capacity;  
HENDERSON POLICE DEPARTMENT,  
a municipal entity; CITY OF  
HENDERSON, a municipal entity;

Defendants.

CASE NO. 2:22-cv-00023-APG-NJK

**STIPULATION TO EXTEND DEADLINE  
FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

COMES NOW the Plaintiff, MARC GALLI, by and through his counsel, Lisa A. Rasmussen, Esq., of the Law Offices of Kristina Wildeveld & Associates, and Defendants ANTHONY RUSH, EDWARD PICKUP, HENDERSON FIRE DEPARTMENT, MARISSA MEYERS, JOSHUA FILSINGER, HENDERSON POLICE DEPARTMENT, and CITY OF HENDERSON, by and through their counsel, Nicholas G. Vaskov, City Attorney for the City of

Henderson, and Brian R. Reeve, Assistant City Attorney for the City of Henderson, (collectively, the “Parties”), hereby stipulate pursuant to LR IA 6-1 and LR IA 6-2 to extend the time for Plaintiff to respond to Defendants’ Motion for Summary Judgment [ECF No. 23], filed on September 21, 2022, by twenty-one (21) days, to November 2, 2022. This is Plaintiff’s first request for such extension of time.

The Parties hereby stipulate and agree as follows:

**I. PROCEDURAL BACKGROUND**

1. Plaintiff’s Complaint was filed in the Eighth Judicial District Court on September 23, 2021. It was removed to this Court on January 4, 2022. [ECF No. 1].

2. On January 11, 2022, Defendants filed their answer to Plaintiff’s complaint. [ECF No. 5.]

3. On February 11, 2022, the Parties’ stipulated discovery plan and scheduling order was approved, setting a dispositive motions deadline of August 10, 2022. [ECF No. 19.]

4. On July 13, 2022, the Parties’ stipulation and order to extend the dispositive motions deadline was approved, setting a dispositive motion deadline of September 21, 2022. [ECF No. 22.]

5. On September 21, 2022, Defendants filed their motion for summary judgment. [ECF No. 23.]

6. The response to Defendants’ motion for summary judgment is currently due on October 12, 2022. *See* LR 7-2(b).

7. Plaintiff’s counsel has experienced several pre-existing deadlines that have impeded her ability to respond to the Defendants’ motion, including a petition for writ of certiorari due in the United States Supreme Court, Case No. 22-5741, *Hylton v. United States*.

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1 **II. STIPULATION AND ORDER**

2 Based on the foregoing, the parties HEREBY STIPULATE that the time for Plaintiff to  
3 respond to Defendants' motion for summary judgment [ECF No. 23] shall be extended by twenty-  
4 one (21) days, from October 12, 2022, to November 2, 2022.

5 IT IS SO STIPULATED this 12th day of October, 2022.

6 **THE LAW OFFICES OF KRISTINA  
WILDEVELD & ASSOCIATES**

**CITY OF HENDERSON**

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8 By: /s/ Lisa A. Rasmussen

By: /s/ Brian R. Reeve

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16 **IT IS SO ORDERED**

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UNITED STATES DISTRICT JUDGE

DATED: October 13, 2022